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**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION**

In re	}	CASE NO.: 8:22-bk-12142-SC
2 <sup>ND</sup> CHANCE INVESTMENT		Chapter 11
GROUP, LLC,		<b>STIPULATION FOR RELIEF</b>
		<b>FROM AUTOMATIC STAY</b>
Debtor.		<b>UNDER 11 U.S.C. §§ 362(d)(1)</b> <b>AND 362(d)(2) RE: 37915</b> <b>MARSALA DRIVE, PALMDALE,</b> <b>CA 93552, APN NO. 3023-073-011</b>
	}	Date: None required
		Time: None required
		Judge: Hon. Scott C. Clarkson

This Stipulation is entered into by and between 2nd Chance Investment Group LLC, debtor ("Debtor"), by David Goodrich, its Chief Restructuring Officer, and LMF2, LP, a California Limited Liability Partnership corporation ("Lender") (Debtor and Lender are hereinafter collectively referred to as the "Parties"), with respect to the following facts:

**RECITALS**

1. The Debtor listed an ownership interest in certain real property commonly known as 37915 Marsala Drive, Palmdale, CA 93552, APN NO. 3023-073-011 (the

1 “Real Property”). The legal description for the Real Property is attached hereto as  
2 Exhibit “1.”

3 2. On or about June 6, 2022 Advance Real Estate & Construction Solutions  
4 Corporation (“Advance”), borrowed from the Lender the sum of \$310,000 which the  
5 Debtor used to purchase the Real Property and for repairs. Repayment of this loan was  
6 secured by a deed of trust recorded in the Los Angeles County Recorder’s office on  
7 June 17, 2022 as instrument no. 20220641678, and was memorialized by a note of even  
8 date. Advance assigned all title, interest and obligations it had in the Real Property and  
9 in the note and deed of trust to the Debtor by instrument recorded as 22-11008909 on  
10 October 21, 2022.

11 3. No payments have been made beginning with the payment due to the Lender  
12 on September 1, 2022, and the real property taxes due and owing on the Real Property  
13 have not been paid.

14 4. Lender asserts that pursuant to 11 U.S.C. § 362(d)(1), cause exists to grant it  
15 relief from the automatic stay because: (1) Lender’s interest in the Real Property is not  
16 adequately protected; (2) the fair market value of the Real Property is declining and  
17 payments are not being made to Lender sufficient to protect its interest against that  
18 decline; (3) real property taxes are not being paid current; and (4) pursuant to 11 U.S.C.  
19 § 362(d)(2)(A), the Debtor has no equity in the Real Property, and, as a result, pursuant  
20 to 11 U.S.C. §362(d)(2)(B), the Real Property is not necessary to an effective  
21 reorganization. Further, recent offers received for the Real Property demonstrate that  
22 there is no equity in the Real Property for the Debtor’s benefit.

23 5. The Parties have met and conferred, and have agreed to the terms of this  
24 Stipulation, as set forth herein.

25 **STIPULATION**

26 As a result of the foregoing, it is hereby stipulated and agreed as follows:

27 1. The above recitals are hereby incorporated into this Stipulation.

28 ///

1           2.     The Lender is entitled to relief from the automatic stay under 11 U.S.C. §§  
2 362(d)(1) and 362(d)(2).

3           3.     Lender (and any and all successors or assigns) may proceed under  
4 applicable nonbankruptcy law to enforce its remedies to foreclose upon and obtain  
5 possession of the Real Property.

6           4.     Mr. Goodrich specifically agrees that any insurance currently in effect for  
7 the Real Property shall not be cancelled for the Real Property until after the order  
8 approving this Stipulation has been entered and is final and non-appealable.

9           5.     Upon entry of the order approving this Stipulation, for purposes of Cal.  
10 Civ. Code § 2923.5, the Debtor is a borrower as defined in Cal. Civ. Code §  
11 2920.5(c)(2)(C).

12           IT IS SO STIPULATED.

13  
14           Dated: <sup>August</sup> ~~July~~ 8, 2023

15           By:

16                                   
17                                 David M. Goodrich,  
18                                 Chief Restructuring Officer for the Debtor  
19                                 2nd Chance Investment Group, LLC

20           Dated: September 12, 2023

21                                 SULLIVAN HILL REZ & ENGEL  
22                                 A Professional Law Corporation

23           By:     /s/Kathleen A. Cashman-Kramer

24                                 Gary B. Rudolph  
25                                 Kathleen A. Cashman-Kramer  
26                                 Attorneys for Lender LMF2, LP  
27  
28



**LEGAL DESCRIPTION**

**EXHIBIT A**

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF PALMDALE, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

LOT 26, OF TRACT NO. 45092, IN THE CITY OF PALMDALE, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 1131 PAGE(S) 60 TO 65 INCLUSIVE OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 3023-073-011

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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**600 B Street, Suite 1700, San Diego, CA 92101**

A true and correct copy of the foregoing document entitled (*specify*):

STIPULATION FOR RELIEF FROM AUTOMATIC STAY UNDER 11 U.S.C. §§ 362(d)(1) AND 362(d)(2) RE: 37915  
MARSALA DRIVE, PALMDALE, CA 93552, APN NO. 3023-073-011

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will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) September 12, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Amanda G. Billyard** abillyard@bwlawcenter.com
- **Stephan M Brown** ECF@thebklawoffice.com, stephan@thebklawoffice.com;roslyn@thebklawoffice.com;brown.stephanb125317@notify.bestcase.com
- **Kathleen A Cashman-Kramer** cashman-kramer@sullivanhill.com, theresam@psdslaw.com
- **Dane W Exnowski** dane.exnowski@mccalla.com, bk.ca@mccalla.com,mccallaecf@ecf.courtdrive.com
- **Lazaro E Fernandez** lef17@pacbell.net, lef-sam@pacbell.net;lef-mari@pacbell.net;OfficeLR74738@notify.bestcase.com;lefkarina@gmail.com
- **Robert P Goe** kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com
- **David M Goodrich** dgoodrich@go2.law, kadele@go2.law;dfitzgerald@go2.law;wgglp@ecf.courtdrive.com
- **Daniel J Griffin** daniel@thebklawoffice.com, tclayton@thebklawoffice.com;daniel@thebklawoffice.com
- **Brandon J Iskander** biskander@goeforlaw.com, kmurphy@goeforlaw.com
- **Charity J Manee** cmanee@goeforlaw.com, kmurphy@goeforlaw.com
- **Randall P Mroczynski** randym@cookseylaw.com
- **Queenie K Ng** queenie.k.ng@usdoj.gov
- **Douglas A Plazak** dplazak@rhlaw.com
- **Arvind Nath Rawal** arawal@aisinfo.com
- **Gary B Rudolph** rudolph@sullivanhill.com, bkstaff@sullivanhill.com;vidovich@ecf.inforuptcy.com;rudolph@ecf.courtdrive.com;james@ecf.courtdrive.com
- **Cheryl A Skigin** caskigin@earthlink.net, caskigin@earthlink.net
- **Richard L. Sturdevant** rich@bwlawcenter.com
- **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov
- **Christopher P. Walker** cwalker@cpwalkerlaw.com, lhines@cpwalkerlaw.com;r57253@notify.bestcase.com
- **Fanny Zhang Wan** fwan@raslg.com
- **Andy C Warshaw** awarshaw@bwlawcenter.com, warshaw.andyb110606@notify.bestcase.com
- **Jennifer C Wong** bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) September 12, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**2nd Chance Investment Group, LLC**

600 W. Santa Ana Blvd.  
PMB 5045  
Santa Ana, CA 92701

**Tenant**

Gregory Steven  
37915 Marsala Dr.  
Palmdale CA  
93552

Honorable Scott C. Clarkson  
United States Bankruptcy Court Central District of  
California Ronald Reagan Federal Building and Courthouse  
411 West Fourth Street, Suite 5130 / Courtroom 5C Santa  
Ana, CA 92701-4593

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 12, 2023 Laurel L. Dinkins  
\_\_\_\_\_  
Date Printed Name

/s/ Laurel L. Dinkins  
\_\_\_\_\_  
Signature